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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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DEC 31 2002

In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Milford, Utah)

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MB Docket No. 02-331
RM-10589

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: John A. Karousos
Assistant Chief, Audio Division
Office of Broadcast License Policy
Media Bureau

REPLY COMMENTS OF CRAIG MORRIS


1. Craig Morris hereby submits these Reply Comments with respect to the above-captioned proceeding. On the deadline for comments herein Mr. Morris submitted a Counterproposal in which he proposed the allotment of Channel 293C3 to Enterprise, Utah, and a number of channel substitutions to accommodate that allotment. Included among those other changes was the substitution of Channel 290C for 272C at Pahrump, Nevada, and the modification of the license of Station KJJJ(FM) to conform with that change. Channel 272B/C is currently allotted to Lake Havasu City, Arizona, but the licensee of Station KJJJ(FM) has proposed, independently of this proceeding, to re-allot the channel to Pahrump.

2. As set forth in the Engineering Statement attached hereto, Mr. Morris's proposals, if adopted, would permit Channel 272C to remain allotted to Lake Havasu City at the city reference point. That is, Station KJJJ(FM)'s operating channel can still be moved to Pahrump (as that station's licensee has proposed), but Lake Havasu City can still retain the same number of channels it presently enjoys. Mr. Morris supplements his original counterproposal to include

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this observation, and to suggest that, should the Commission deem the public interest to so warrant, Channel 272C **should** remain allotted *to* Lake Havasu City (but at the city reference point).¹

Respectfully submitted,


 /s/ Harry F. Cole
 Harry F. Cole

Fletcher, Heald & Hildreth, P.L.C.
 1300 N. 17th Street - 11th Floor
 Arlington, Virginia 22209
 (703) 812-0483

*Counselor Craig **Morris***

December 31, 2002

¹ Leaving Channel 272C at Lake Havasu City would not expand the scope of this proceeding impermissibly because Lake Havasu City, being the community of license to which Channel 272B/C is currently allotted (notwithstanding the pending relocation proposal of Station KJJJ(FM)), was among the affected communities included in Mr. Morris's Counterproposal which **was** timely tiled **on** the date for comments herein.

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-RM-1:

REPLY COMMENTS - MM DOC 02-331
MILFORD, UTAH

RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS

COUNTERPROPOSAL

ALLOTMENT OF CH. 289C3 AT ENTERPRISE, UT
SUBSTITUTION OF CH. 282C2 IN LIEU OF 288C2 AT MILFORD, UT
(Pending RM To Allot Channel in Docket 02-331)
SUBSTITUTION OF CH. 288C FOR 289C AT DOLAN SPRINGS, AZ
UPGRADE OF CH. 292C3 FOR 285A AT CAL-NEV-ARI, NV
SUBSTITUTION OF CH. 294C FOR 293C AT LAS VEGAS, NV
SUBSTITUTION OF CH. 272C1 FOR 295C1 AT OVERTON, NV
SUBSTITUTION OF CH. 290C FOR 272C AT PAHRUMP, NV
(Pending RM by KJJJ To Change from Lake Havasu City, AZ)
SUBSTITUTION OF CH. 294C2 FOR 272C2 AT PAROWAN, UT
SUBSTITUTION OF CH. 292C3 FOR 285C3 AT PEACH SPRINGS, AZ
SUBSTITUTION OF CH. 296C1 FOR 291C1 AT AMARGOSA VALLEY, NV
(Pending RM to Substitute Channel in Docket 01-135)
SUBSTITUTION OF CH. 272A FOR 291A AT TECOPA, CA

***** ADDED BY REPLY COMMENTS *****

ALLOTMENT OF CH. 272C2 AT LAKE HAVASU CITY, AZ
(Made Possible by KJJJ Change to Pahrump, NV)

DECEMBER 30, 2002

Prepared on behalf of

Craig Morris

ENGINEERING EXHIBIT EE-RM-1:

**REPLY COMMENTS - MM DOC 02-331
MILFORD, UTAH**

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS
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From RM Ref. Point for Milford, UT.
5. Figure 3, Channel Study for Ch. 288C - KOAS
From Lic Ref. Point for Dolan Springs, AZ.
6. Figure 3A, Channel Study for Ch. 288C - KOAS
From App Ref. Point for Dolan Springs, AZ.
7. Figure 4, Channel Study for Ch. 292C3 - Vacant (upgrade)
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15. **Figure 12,** Channel Study for Ch. 272C2 - New
From City Ref. Point for Lake Havasu City, AZ.

Fig 12 added in Reply Comments

Fig 1-11 contained in original Counterproposal

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since **1977**. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Craig Morris to prepare the instant engineering exhibit in support of a Reply Comments in MM Docket 02-331 regarding the allotment of a new FM channel to Milford, Utah.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

Executed on the 30th day of December 2002

MULLANEY ENGINEERING, INC.

ENGINEERING EXHIBIT EE-RM-1:

REPLY COMMENTS - MM DOC 02-331
MILFORD, UTAH

RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS

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***** ADDED BY REPLY COMMENTS *****

ALLOTMENT OF CH. 272C2 AT LAKE HAVASU CITY, AZ
(Made Possible by KJJJ Change to Pahrump, NV)

NARRATIVE STATEMENT:

This engineering statement has been prepared in support of a Reply Comments in MM Docket 02-331 which proposes the allotment of Channel 288C2 at Milford, Utah. The purpose of this statement is to provide engineering in support of a Reply Comments to amend the FM Table of Allotments.

These reply comments supplement the original filing to propose that Ch. 272C2 be allotted to Lake Havasu City, Arizona (a city already part of the docket). The original proposals resulted in the deletion of 272B from Lake Havasu City and the allotment of 272C modified *to* 290C at Pahrump, NV, for use by KJJJ. The proposed move by KJJJ to Pahrump will make it possible *to* allot 272C2 at the city reference point for Lake Havasu City (34-28-41 / 114-19-40) thus maintaining the same number of aural services in that community. Figure 12 is a study demonstrating compliance with the spacing rules.

* * * * *

Craig Morris believes that the proposed changes to the table of allotments will result in a preferential arrangement of allotments. The creation of two new allotments (Enterprise, UT & Lake Havasu City, AZ) and the upgrade of a vacant allotment (Cal-Nev-Ari, NV) serves the public interest by providing additional service *to* 66,425 persons. This does not include the population benefit of the change by KJJJ which is already pending (1,265,480 persons). If granted, Morris will file a CP application for operation on 289C3 at Enterprise, UT and for 292C3 at Cal-Nev-Ari, NV and will see that other licensees similarly file as needed.

/s/ John J. Mullanev

John J. Mullaney, Consulting Engineer

December 30, 2002.

Craig Morris
December 2002

REFERENCE
34 28 41 N
114 19 40 W

CLASS = C2
Current Spacings

DISPLAY DATES
DATA 12-28-02
SEARCH 12-28-02

----- Channel 272 - 102.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
MI-12	272C2	Lake Havasu City	AZ 0.00	0.0	CITY REFERENCE POINT	
KJJJ.C CP	272B	Lake Havasu City	AZ 30.14	319.2	240.5	-210.36 MI-07
RDEL DEL	2728	Lake Havasu City	AZ 30.14	319.2	240.5	-210.36 MI-07
KJJJ LIC	272C2	Lake Havasu City	AZ 14.78	56.3	189.5	-174.72 MI-01
MI-06R	272C1	Overton-CITY	NV 229.39	357.4	223.5	5.89
KJ-01	272C	Pahrump-KJJJ	NV 257.39	320.7	248.5	8.89
KAHM LIC	271C	Prescott	AZ 204.17	82.8	187.5	16.67
KJJZ LIC-N	272A	Indio	CA 187.67	249.4	165.5	22.17
MI-06	272C1	Overton-VAC	NV 254.85	0.4	223.5	31.35
RADD ADD	272C1	Overton	NV 254.85	0.4	223.5	31.35
ALLO VAC	275C3	Quartzsite	AZ 90.77	174.2	55.5	35.27
MI-06D	272C1	Overton-VAC	NV 268.32	355.3	223.5	44.82
ALLO VAC	270A	Salome	AZ 101.64	139.4	54.5	47.14
KNIXFM LIC	273C	Phoenix	AZ 244.84	120.7	187.5	57.34

Once KJJJ moves from 272B to Pahrump using 272C or 290C it is still possible to keep Ch. 272C2 allocated to Lake Havasu City, AZ.

Ch. 272C2 works from the city reference point or from KJJJ's licensed site

CHANNEL STUDY - 286C1 - LAKE HAVASU CITY, AZ - NEW

CRAIG MORRIS
REPLY COMMENTS
MB DOCKET 02-331 - MILFORD, UTAH

MULLANEY ENGINEERING, INC.
GAITHERSBURG. MARYLAND

FIGURE 12
DECEMBER 2002

CERTIFICATE OF SERVICE

I, Evelyn Ojea, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that a true copy of the foregoing "Reply Comments of Craig Morris" was sent this 31st day of December, 2002, via hand-delivery and United States First Class Mail, postage prepaid, on the follows:

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Federal Communications Commission
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Washington, D.C. 20554

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(Licensee of KSNE-FM)

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Louisville, KY 40291
(Milford, Utah Petitioner)

KPUP(FM)
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Tylertown, MS 39667

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P.O. Box 10
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(Licensee of KTCE, Payson, UT)

Tri-Market Radio Broadcasters, Inc
144 Seminole Circle
Jerome, ID 83338
(Licensee of KKMV, Rupert, ID)

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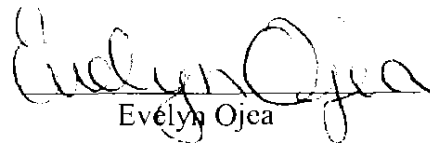
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*Hand-Delivered



Evelyn Ojea